

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
RAW STORY MEDIA, INC., ALTERNET	:	
MEDIA, INC.,	:	NO. 1:24-cv-01514-CM
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
OPENAI, INC., OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPCO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, OPENAI	:	
HOLDINGS, LLC,	:	
	:	
Defendants.	:	
	:	
-----	X	

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Allyson R. Bennett hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC.

I am good standing of the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: March 26, 2024

MORRISON & FOERSTER LLP

By: /s/ Allyson R. Bennett

Allyson R. Bennett (*pro hac vice pending*)

abennett@mofo.com

707 Wilshire Boulevard

Suite 6000

Los Angeles, CA 90017

Telephone: 213.892.5200

Facsimile: 213.892.5454

Attorneys for Defendants

OPENAI, INC., OPENAI GP, LLC,

OPENAI, LLC, OPENAI OPCO LLC,

OPENAI GLOBAL LLC, OAI

CORPORATION, LLC, and OPENAI

HOLDINGS, LLC